

**Name Relationship Search Index (NRSI)
PRIVACY IMPACT ASSESSMENT (PIA)**



November 27, 2012

Privacy Impact Assessment
Name Relationship Search Index (NRSI), v5

General Information

1. Name of Project or System.
Name Relationship Search Index (NRSI), v5

2. Describe the project and its purpose or function in the SEC's IT environment.
The U. S. Securities and Exchange Commission (SEC) uses a number of Automated Information Systems to record and track information relating to companies that deal in securities exchanges. The information managed by these different automated information systems is received from a number of disparate sources. As a result, the information recorded often contains typographical errors and variations in the spelling or abbreviations of names for companies and individuals.

The NRSI (Name Relationship Search Index) application provides a cross-reference of data by name that is contained in multiple internal automated SEC systems. NRSI enables agency staffers to cross-reference information available in these automated information systems by entering a partial or full name of an individual or company. NRSI uses this partial or full name information to retrieve a list of records and other information related to that name.

3. Requested Operational Date? The NRSI system is currently operational. The NRSI v5 upgrade requested effective date is 03/01/2013. The NRSI PIA was approved on 4/25/07. This PIA is being conducted to assess the current privacy vulnerabilities and risks and their implications on NRSI v5.

4. System of Records Notice (SORN) number? SEC-27

5. Is this an Exhibit 300 project or system? No Yes

6. What specific legal authorities, arrangements, and/or agreements allow the collection of this information? Title 15, United States Code, sections 77e, 77f, 77j, 77g, and 770; 78f, 781, 78m, 780, 780-1, 78p, 78q-1, and 78u; 79c, 79f, 79g, 79r, and 79s; 77eee, 77mmm, 77nnn, 77ttt, and 77uuu; 80a-8, 80a-20, 80a-29, 80a-32; 80a-40; 80a-44, and 80a-45; 80b-3, 80b-4, 80b-12, and 80b-16.

Specific Questions

SECTION I - Data in the System

1. What data about individuals could be collected, generated, or retained?
Partial or full name information, is retrieved from other internal SEC databases, which results in a list of records and other information related to that name in the NRSI system. The records from the multiple internal and external automated SEC systems include the SEC file numbers, date, information on the relationship, disposition of cases (if available), and violations alleged (if any).

2. Does the project/system use or collect the social security number (SSN)? (This includes truncated SSNs)
 No.
 Yes. If yes, provide the function of the SSN and the legal authority to collect.
Where the identification number is the social security number, collection of this information is authorized by Executive Order 9397.

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3. What are the sources of the data?
The sources include filings made by issuers, broker-dealers, investment advisers, insiders, self-regulatory organizations, and others; documents relating to matters under inquiry; and enforcement actions. The enforcement documents are comprised of SEC opinions and orders, recommendations from SEC enforcement officials for institution of docketed investigations, court pleadings, and findings and orders issued by State and Federal courts, State securities boards, national securities exchanges, and self-regulatory organizations, and individuals, including the individual to whom the information relates. Information may also be received from other State, local or foreign law enforcement or regulatory organizations, as well as complaint letters received by the Commission.
4. Why is the data being collected?
The records are computerized and are used to cross-reference data by name that is contained in multiple internal and external automated SEC systems that relates the names of the individual to the docketed name of the formal filing or the case name when an enforcement or litigation proceeding is involved.
5. What technologies will be used to collect the data?
Java Database Connectivity (JDBC), Secure Socket Layer (SSL)

SECTION II - Attributes of the Data (use and accuracy)

1. Describe the uses of the data.
Provides an index to names contained in various internal and external automated SEC information systems, including filings with the Division of Corporation Finance, and Division of Enforcement inquiries and investigations. NRSI enables agency staff to locate information available in these systems by entering the partial or full name of an individual or company. NRSI uses this partial or full name information to retrieve a list of records and other information related to that name.
2. Does the system analyze data to assist users in identifying previously unknown areas of note, concern or pattern? No Yes If yes, please explain:
NRSI enables agency staffers to cross-reference information available in multiple internal automated SEC systems by entering a partial or full name of an individual or company to assist users in identifying previously unknown areas of note, concern or pattern.
3. How will the data collected from individuals or derived by the system be checked for accuracy?
The data is retrieved directly from the original database sources (EDGAR FSE and HUB database systems). This eliminates the potential problems or inaccuracy that might have been encountered while transferring data from the original sources.

SECTION III - Sharing Practices

1. Will the data be shared with any internal organizations?
 No Yes If yes, please list organization(s): The data is only shared among staff in SEC internal organizations granted access to carry out official functions related to the SEC's regulatory authority. .
2. Will the data be shared with any external organizations?

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No Yes If yes, please list organizations(s): Assessments based on this data may be shared with authorized individuals in other regulatory agencies, law enforcement agencies, or self-regulatory organizations pursuant to applicable Privacy Act system of records notices. How is the data transmitted or disclosed to external organization(s)? The assessments are securely transmitted using SSL encryption.

3. How is the shared data secured by external recipients?
Only internal SEC staff members with access to SEC Intranet (behind the SEC firewall) can access this application. The application requires the individuals be authenticated.
4. Does the project/system process or access PII in any other SEC system?
 No
 Yes. If yes, list system(s). EDGAR FSE, HUB, ACTS, TCR, and IARD

SECTION IV - Notice to Individuals to Decline/Consent Use

1. What privacy notice was provided to the different individuals prior to collection of data?
(Check all that apply)
 Privacy Act Statement System of Records Notice Privacy Impact Assessment
 Web Privacy Policy Notice was not provided to individuals prior to collection
2. Do individuals have the opportunity and/or right to decline to provide data?
 Yes No N/A
Please explain: Data is collected from filings required by the SEC, and from information delivered to SEC because of enforcement-related inquiries or investigations.
3. Do individuals have the right to consent to particular uses of the data?
 Yes No N/A
Please explain: Data is only collected for law enforcement purposes that come under the agency's enabling legislation. Individuals do not have the right to consent to this law enforcement use, and the data is not used for other purposes.

SECTION V - Access to Data (administrative and technological controls)

1. Has the retention schedule been established by the National Archives and Records Administration (NARA)?
 No If no, please explain:
 Yes If yes, list retention period: NRSI retrieves data directly from EDGAR FSE, CATS 2000, ACTS, TCR and IARD database systems. Thus, the retention schedule has been depending on the schedule set for these systems. These records will be maintained until they become inactive, at which time they will be retired or destroyed in accordance with records schedules of the United States Securities and Exchange Commission and as approved by the National Archives and Records Administration.
2. Describe the privacy training provided to users, either generally or specifically relevant to the program or system?
All SEC staff and contractors receive annual privacy awareness training, which outlines their roles and responsibilities for properly handling and protecting PII.

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3. Has a system security plan been completed for the information system(s) supporting the project?
 Yes If yes, please provide date C&A was completed: The NRSI system was initially accredited 2005. It was most recently re-accredited on 1/30/12.
 No If the project does not trigger the C&A requirement, state that along with an explanation
4. Is the system exposed to the Internet without going through VPN?
 No
 Yes If yes, Is secure authentication required? No Yes; and
Is the session encrypted? No Yes
5. Are there regular (ie. periodic, recurring, etc.) PII data extractions from the system?
 No
 Yes If yes, please explain: Assessments based on this data may be extracted electronically or hardcopy, and shared internally and externally. The assessments contain PII related to the names cross-referenced in the multiple internal automated SEC systems.
6. Which user group(s) will have access to the system?
NRSI Enterprise is accessible and used by the SEC's users. However, certain features of the application can only be used by ENF staff members.
7. How is access to the data by a user determined? User Roles
Are procedures documented? Yes No
Procedures are document in the Standard Operating Procedures For Name Relationship Search Index (NRSI) Enterprise Version 4.0, dated 10/10/10
8. How are the actual assignments of roles and rules verified.
Database access is restricted to the users who are authorized to have the information and UI is restricted by Login Authentication and various user Roles which restrict the access to different parts of the application.
9. What auditing measures/controls and technical safeguards are in place to prevent misuse (e.g., unauthorized browsing) of data?
Users with access to SEC Intranet can access this application. The application will require the user be authenticated. To be properly authenticated and become an active user of the NRSI application, a user must follow the following process:
- a. All employees should complete ITSM System Access Request, which will follow established system access procedure workflow for approval.
 - b. Approved request goes to the OIT Database Administrator for account creation into the Sybase ASE.

SECTION VI - Privacy Analysis

Given the amount and type of data being collected, discuss what privacy risks were identified and how they were mitigated.

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The primary privacy risk identified is a potential data breach and subsequent loss or unauthorized disclosure of PII. The risk of a data breach is mitigated by security controls implemented and documented for the NRSI. These controls are in accordance with those recommended by the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 revision 3 for a moderate risk system in accordance with Federal Information Processing Standards (FIPS) 199 evaluation.

All connections to the application must be made using SSL. Thus, to access the application through a web browser, https:// must be used, not http://. To access the Sybase database, an SSL connection must be created if the database server has been SSL enabled.